

DECHERT LLP
 Robert A. Cohen
 Dennis H. Hranitzky
 Michael Z. Goldman
 1095 Avenue of the Americas
 New York, New York 10036
 Telephone: (212) 698-3500
 Facsimile: (212) 698-3599
 (NML@dechert.com)
Attorneys for Plaintiff
NML Capital, Ltd.

DEBEVOISE & PLIMPTON LLP
 David W. Rivkin
 John B. Missing
 Suzanne M. Grosso
 919 Third Avenue
 New York, NY 10022
 Telephone: (212) 909-6000
 Facsimile: (212) 909-6836
 (EM@debevoise.com)
Attorneys for Plaintiff EM Ltd.

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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NML CAPITAL, LTD.	: 03 Civ. 8845 (TPG)
	: 05 Civ. 2434 (TPG)
	: 06 Civ. 6466 (TPG)
Plaintiff,	: 07 Civ. 1910 (TPG)
	: 07 Civ. 2690 (TPG)
v.	: 07 Civ. 6563 (TPG)
	: 08 Civ. 2541 (TPG)
REPUBLIC OF ARGENTINA,	: 08 Civ. 3302 (TPG)
	: 08 Civ. 6978 (TPG)
Defendant.	: 09 Civ. 1707 (TPG)
	: 09 Civ. 1708 (TPG)
-----X	
EM LTD.,	:
	:
Plaintiff,	:
	: 03 Civ. 2507 (TPG)
v.	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
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NOTICE OF CROSS-MOTION TO COMPEL

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Opposition to Motion to Quash Subpoena Served on Nonparty Jaime Caruana and in Support of Motion to Compel, dated November 19, 2010, and the accompanying Declarations of Alex Cukierman Ph.D., Saverio Lembo, and Dennis Hranitzky, and all prior pleadings and proceedings in these actions, plaintiffs NML Capital, Ltd. and EM Ltd. will move this Court, before the Honorable Thomas P. Griesa, at Courtroom 26B of the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court, for an Order pursuant to Rules 30, 45 and 69 of the Federal Rules of Civil Procedure to compel nonparty Jaime Caruana to comply with the subpoena served on October 7, 2010, and granting such other and further relief as the Court deems appropriate.

Dated: New York, New York
November 19, 2010

DECHERT LLP

By: 

Robert A. Cohen
Dennis H. Hranitzky
Michael Z. Goldman
(robert.cohen@dechert.com)
(NML@dechert.com)
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3501

Attorneys for Plaintiff NML Capital, Ltd.

DEBEVOISE & PLIMPTON

By:  /dhh

David W. Rivkin
John B. Missing
Suzanne M. Grosso
(dwrivking@debevoise.com)
(EM@debevoise.com)
919 Third Avenue
New York, NY 10022
(212) 909-6000

Attorneys for Plaintiff EM Ltd.